

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

**JERRY MCKINNEY, SR.**

**CIVIL ACTION NO. 1:19-CV-01339**

**VERSUS**

**JUDGE DRELL**

**RAPIDES PARISH SHERIFF'S  
OFFICE and SHERIFF WILLIAM  
EARL HILTON**

**MAGISTRATE JUDGE PEREZ-MONTES**

**PLAN OF WORK**

On December 3, 2019, the following individuals participated in a meeting by telephone conference during which this Plan of Work was formulated: (List all parties and their counsel, if any, including e-mail addresses for trial attorneys.)

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Attorney for Defendant, William Earl Hilton, Sheriff of Rapides

**PART A**

Based on the information now reasonably available, the parties have agreed upon the following:

1. 1/30/20 Date disclosures under Fed. R. Civ. P. 26(a) were made or will be made
2. 3/30/20 Final date for adding parties
3. 3/30/20 Final date for filing amended pleadings
4. 9/15/20 Final date for Plaintiff to employ and disclose experts

5. 10/15/20 Final date for Defendants to employ and disclose experts
6. 10/30/20 Deadline for completion of Fact Discovery
7. 11/30/20 Final date for Plaintiff's disclosure of reports of experts
8. 12/30/20 Final date for Defendants' disclosure of reports of experts
9. 1/30/21 Final date for Depositions of Experts
10. 2/15/21 Final date for filing Dispositive Motions

Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: NONE.

#### **PART B**

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: NONE.

Respectfully Submitted:

**PROVOSTY, SADLER & deLAUNAY, APC**

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OF RAPIDES

Respectfully Submitted:

**LAW OFFICE OF WILLIAM MOST**

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JERRY MCKINNEY, SR.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of December, 2019, I electronically filed the foregoing PROPOSED PLAN OF WORK with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to the following:

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I further certify that I have forwarded the foregoing document via facsimile and/or first-class mail to the following non-CM/ECF participants: NONE

/s/ H. Bradford Calvit  
H. BRADFORD CALVIT